

**National Apprenticeship Act
Revised Regulations Webinar Transcript**

October 30, 2008

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MS. KARIN BROWN: I know we don't have many opportunities to all come together, so this is kind of exciting. We are looking forward to hearing from Dana and John talk about our revised regulations. All right. I'm going to talk a little bit about this classroom layout. It should be very similar to Workforce 3.1 that we're all pretty familiar with. In the center of the slide is something called a presentation slide area, and that's the main focus of what we'll be reviewing today.

The second area that I'd like to call your attention to is the submit questions box to the right, and that's how we'll be taking questions today. We want to make sure we track them down and keep a good running log of all of the questions so it's very important that we type them in, so we ask you to submit the questions typed in. Just above that is the conference line information, just to confirm that you're still dialed in. And above that is the minimize control panel. If you'd like to just see the presentation slide, then you just click that button and it will minimize the bars to the right.

Again I want to emphasize that you'll use the submit questions box to let us know what your questions are throughout the webinar. We've got a series of slides set up that do permit for questions, and then of course at the end we'll look to take questions.

We now that there are going to be probably hundreds and hundreds of questions, so another caveat today is that we will try to answer the questions as time permits, and go through them. We may call on you to ask your questions for the benefit of the group if we see one that will kind of tie in nicely with what we're talking about.

And then also, just another reminder that we will be having a whole bunch of webinars and so if your question isn't answered today, which is entirely possibly, particularly if it's something that's detailed and it pertains to something we know we need to develop more guidance on, we will be hosting webinars and providing a whole series of training sessions. But we'll get into that in a little bit.

So without further ado I'd like to introduce our presenters, whom you know quite well; John Ladd, our Administrator, and Dana Dougherty, our Deputy Administrator. All right. We're going to skip over John's bio, since you all know him quite well, and go right into the background.

MR. JOHN LADD: All right.

MS. KARIN BROWN: Thank you, John.

MR. JOHN LADD: Thanks, Karin, and good morning everybody, and especially those of you on the west coast and out on Hawaii. We really do appreciate your willingness to be here this morning. We really did struggle to find a time where we could get everybody together, and this just seemed like the best block of time where we could get to you all and go through all this information and make sure you had it before the information was sent out to the general public later this afternoon.

I did want to say a special thank you to Karin and Dana for their tremendous leadership and work over the last couple of years in making sure that this day actually happened. They've been working diligently and doggedly to shepherd this process all the way through from early days, from a set of principles that the ACA drafted, through countless revisions, toiling through comments, and working with stakeholder groups. Really, we owe them all a huge set of gratitude. I really do appreciate what they've done and what they've done for the National Apprenticeship System.

Karin mentioned that we all know each other pretty well. I actually do regret that in my first year as your Administrator I have not been able to get out as much as I would have liked to. We've been in some pretty tight fiscal situations here, throughout the department, and I have not been able to travel as much as I would have liked to. I would have really liked to have been to every regional city at a minimum during this first year, and that's my commitment, that in the second year I will be able to get out to at least every regional city and be able to meet with all of you face to face, so I am looking forward to that. I'm just so impressed with the dedication, the hard work, the knowledge, the expertise, the passion that all Office of Apprenticeship staff have for the National Apprenticeship System, and it really humbles me

every day to be a part of this process and to be your administrator.

A quick history here and we'll advance to the next slide. You know, these are things that are fairly well known to most folks, but I think we do need to recognize that this is a very significant day in the long and proud history of the National Apprenticeship System. Obviously The National Apprenticeship System was created in 1937 and the current regulations were promulgated in 1977, so it's been 30 years since we've updated these regulations.

Obviously in 30 years there's been tremendous change in the economy and in the world, as well as large social changes. We've had huge technology changes, the evolving global marketplace, shifting workforce demographics as our workforce gets older and more diverse, and the very nature of work has changed. We've seen that very clearly in the nature of our Registered Apprenticeship programs.

And if nothing else, we really do hope that these regulations are an opportunity to provide a modernized regulatory framework that recognizes these changes in the economy and in the rest of our society.

So it is an important day to registered apprenticeship. I think this will be one of the landmark days in our attempt and all of our efforts to make sure that the next 70 years of Registered Apprenticeship is as strong as its first 70 years.

We also do believe that there are tremendous opportunities that are embedded within these regulations, and even if these regulations didn't pass, if we can go back to the prior slide, we're working out some kinks here, folks. You know, not only are these tremendous changes happening with the economy and in society as a whole, but a lot of forces have been coming together to really position Registered Apprenticeship to have tremendous relevance and importance in the coming century.

We all are hearing of the tremendous skills gaps that are out there that, despite the current economic crisis, will have very significant impact for us, we know that the long term picture is that the economy is growing, that the need for skilled workers is growing every day. We know that there are drop out issues in high school and at the

secondary level and we know that there's growing income inequality gaps that Registered Apprenticeship can address by providing career paths to long-term economic security for millions of Americans beyond the traditional approach of going to college and other pathways. So there are a lot of opportunities for Registered Apprenticeship that we can take advantage of with this updated regulatory framework.

Some of the things that we're specifically looking are advancing the Registered Apprenticeship model. This tremendous model that combines earning and learning, and is relevant to so much of the broad workforce, and is critical to so many of the talent development needs of many industries. This is a strategy that can be increasingly relevant to the 21st century, and these regulations help us to support that.

It also will help us as we provide new options and more flexibility to align with the needs of a new generation of workers, workers that want to progress faster, that want to be able to advance at their own pace, to have a more flexible career path. Some of the options within these regulations give us that flexibility to do that.

Again, the foundation of Registered Apprenticeship has been built on the needs of the construction industry and that foundation is strong and solid. We have also been expanding into high growth industries and we continue to expand, and we'll be looking at green industries, and clean energy, and a whole lot of other new opportunities moving forward.

These industries have certain needs and are looking to those competency-based models, those hybrid models, those interim credentials that are available, and these regulations help to really codify a lot of those innovations that are already happening out there, and a lot of these have already conceded over the last five years or so.

And then, you know, we are still committed to expanding partnerships with the workforce system, and with the education systems. We have new opportunities and new tools in our toolbox now because of these regulations that will help to forge those partnerships, expand those partnerships, and make them stronger.

So those are some of the tremendous opportunities that we see that we will have over the next few years and ones that we'll all be focusing on in the years to come.

Before jumping into the actual text of the regulations I did want to spend a little time with you talking about some of the goals that we've had for these revised regulations. Many of these were driven directly from the ACA's guiding principles that really kicked off this process. These were our guideposts, these were things that we looked to, to help us when we needed to resolve and address conflicting opinions on issues. We really tried to look back at what were the ACA's guiding principles, what are we trying to achieve here, and these are some of the themes and goals that you'll see recurrent throughout this entire regulatory text.

The first, and we kind of touched on this a little bit, but again is to advance the National Apprenticeship System by providing new options and increase flexibility. Again, making sure that the system is flexible and adaptable to meet the needs for the 21st century.

The second is to promote apprenticeship. The model of apprenticeship is a critical talent development strategy for today's regional economies.

We're in a global economy. We're in a world where sponsors, employers, and labor management organizations are crossing state boundaries all the time. We need an apprenticeship system that is able to meet those needs and can adapt that model to a number of new and emerging industries.

The third theme involved in these regulations is to strengthen the National Apprenticeship System by providing consistency and continuity across the system. You'll see that in a number of places, particularly around the SAA governance type things. We really did want to strengthen the system and to ensure that there's consistency across the entire system.

And then finally we want to make sure that there is a consistent framework to promote true performance outcomes and quality. You'll see that throughout the entire document, most notably with the inclusion of completion rates as a critical performance factor when evaluating the performance of programs.

So those were some of the goals. Please keep them in mind for walking through the document that we'll go through in a few more minutes. These are some of the goals and themes that we want to get out to the Apprenticeship community, and be part of our talking points, and how we frame the discussion.

So one last thing we're going to do here before we jump into the actual reg text is that we just want to remind people how we got here today. If we walk through the process just a little bit, primarily for the purpose of being very clear, this was a collaborative process. We engaged the Apprenticeship community throughout the entire process. This was not a DOL driven process, where we locked ourselves in a closet and came down from the mountain with a set of regulations. This has been a process that has been guided by the Apprenticeship community really from the start.

As I mentioned before, even before we developed the NPRM, what guided that development was a set of principles from the Secretary's Advisory Committee on Apprenticeship. The committee's workgroup developed very specific regulatory text on all the major sectors of the final rule, with the exception of the governance section.

We did have input from NASTAD on those governance sections, but they were also involved in the development of the NPRM. The NPRM was published last December, and we received over 2,000 comments, or actually over 2,600 comments on that rule. We extended the comment period by an additional 30 days to ensure people had adequate time to review and consider the proposed rule. We had significant support here to be able to sift and sort all of those comments.

We then carefully and deliberately considered every single comment. We debated those comments, we reviewed them, we considered them, and we looked at them in the context of what the entire Apprenticeship community said on that issue.

We also then went back and compared it to what the ACA's original principles and recommendations were. We then made a determination as to whether we would include that recommendation from the comment, include it in part, revise it, or if we disagreed with that comment.

Regardless of the outcome, how we considered that comment is covered in the preamble of the document. It's very important that everybody reads the preamble of this rule. That provides the policy justification and the discussion of the consideration of the issues. That is what will help you to understand the broader context and the full justification for every aspect of this rule, so we really do encourage you to make sure that you do read that preamble and don't just go straight to the regulatory pack.

From that process we then began to draft the final rule, and from there it was a process that was an internal governmental process, a rule making process that required us to get through the leadership here and the permanent training administration, through the department, through an OMB review process, through a governmental review process, and then final approval to publish the final regulations.

So it's been a long and winding road, but it has been one that has involved the full participation of the Apprenticeship community, and this is our diagram of that process and that flow, again, kicking off with the ACA, continuing through the NPRM comment period, careful consideration of every single one of those comments and then the crafting and drafting of the final rule.

One other piece that you all should know as well, and we'll touch on this as we wrap up here at the end, but we have been engaged in this rollout since Tuesday. Now, the regs were published Wednesday, but we have been working with both the leaderships groups of many of our national stakeholders to really provide advanced briefings and to walk them through how we have tried to meet their concerns that they have raised throughout the comment process. We have already met with the co-chairs of the Advisory Committee on Apprenticeship, we have met with many of the training directors of the Building and Construction Division, we have met with the Employer and Industry Association national organizations, and we have met with our State Apprenticeship Agency, the SAA director. And we have been in heavy consultation and roll out mode here for the past few days.

We understand that people need time to absorb this document. It is a 141 page word document and a 71 page document in the federal register version. It is dense, it

is technical, it will take time for people to absorb this, but we have been trying to get information to people in a timely way and to make sure that people understand what's in the rule and that we're available to assist them in getting their questions answered.

With that I'm going to stop here. I'm going to turn it over to Dana and we are going to spend the bulk of this session then going through the actual reg text, what's changed, what's new, and really highlight the key things that are important to point out in the regulations. I'm going to turn it over to Dana who luckily still has a voice after the last couple of days here. I thank you all for being here today, and look forward to your questions as we move through this document.

MR. DANA DAUGHERTY: Thank you, John. Good morning, everybody. Everybody does pretty well know me. I've been around for a while, and as you can see, this is regulations at a glance. For those of us out of the apprenticeship industry for as many years as many of us have been in it, we are regulation driven, and everybody understands that.

We're going to go to the high points of the revised regulation today. We're not going to get into the weeds. That's very important because as Karin said, we're going to have additional webinars, there's going to be training. We are eventually going to get into the weeds, but we want everybody to understand what has changed, what these new regulations are providing, and we really do not want anybody to do their own interpretation.

We need, as John said, to have consistency across the board so if you're asked questions, we've got things designed for people to send questions in so that we can have one consistent answer across the board.

The table of contents that the revised regulations consist of this time is one additional section, and the new section is 29.6, the program performance standards, so now our regulation goes from the preamble through to 29.14, so we did catch up one additional element, as far as the regulations go.

John made reference to the preamble, and we all know how important the preamble is, but I just want to emphasize what a preamble actually is and does. It is the persuasive

authority, and the legislative history of the rule making process. If there is a dispute about what the regulation means, what's intent was, the preamble is the first source for the intent of the regulation when drafted.

I know John thanked Karin and I for shepherding this through the process, and for preparing most of it. The preamble in the existing regulations, in my opinion, and probably your opinion if you've been around very long is pretty poor. I want to congratulate Karin for the preamble in our revised regulation. There should be no question at all what the intent is, or where we were trying to get to in these regulations.

We really took everybody's comments into consideration, and you can see that we did, because we actually in a couple of cases picked up their language, and that language is now part of our regulations.

So anyway, keep that in the back of your mind on your important the preamble is.

29.1, The Scope. There was an addition to the scope, and that addition was to promote apprenticeship opportunity. As we all know, the Fitzgerald Act requires this, and our purpose in scope lacked the fact that we were supposed to promote apprenticeship opportunities, so you felt that it was incredibly important to incorporate that into our regulations, so we have done that.

On 29.2, The NPRM had seven additional definitions from the comments that we got. The Apprenticeship community wanted a couple of new definitions added. They didn't feel that we had clarified sufficiently in the NPRM, so we added new definitions for completion rates and quality assessment.

The completion rate means a percentage of an apprenticeship cohort who receives a Certificate of Apprenticeship Completion within one year of the projected completion date. And then it does go on, but that is the framework for this definition. We all understand that everybody doesn't complete an Apprenticeship program in a four year term or a five year term, so to establish a completion rate we know sometimes it takes a year longer for people to get through them, and we wanted to be fair and equitable.

The next definition was quality assurance assessment.

We've been doing these for I don't even know how long. They were being done before I came in and I've been with the Agency for 23 years. But some people didn't understand what they were or wanted a definition put in, so we codified that a quality assurance assessment means a comprehensive review conducted by a registration agency regarding all aspects of an apprenticeship program performance.

That's the highlight. Like I said, those of us who have been around for quite some time understand what that is and what the intent is. We did have to codify that from the questions that we received from public comment.

Then we go on to 29.3, Eligibility and Procedures For Registration of an Apprenticeship Program. We carried forward many of the major provisions of the original 1977 regulation.

We did incorporate two new elements into the eligibility and procedure for registration, and those are provisional registration and time frames.

Provisional Registration. Programs that meet standards for registration must be given provisional approval for one year and must be reviewed for quality and conformity at the end of the first year. That's very significant. We feel that this will give us the opportunity to hopefully ensure a quality program and also provide technical assistance so that we don't have programs registered and then they're never fully utilized by that sponsor, and if they're not going to be utilized by that sponsor, we don't really need programs in our database that are not utilizing the system.

The second element of that is the time frame: I don't know how many of you can remember the NPRM verbatim, but we had a time frame for responding to prospective sponsors or existing sponsors for a proposed set of standards or modifications to their standards that had been established at 45 days. We thought that was a pretty decent response time frame to get back to them and just let them know where we were, or what they needed to do to make it sufficient for us to accept.

The State Apprenticeship Agencies and several of the commenters made the point that some State Apprenticeship Agencies only meet quarterly. Therefore we totally agreed,

and changed that timeframe to 90 days, so that means our staff and State Apprenticeship Agencies will now have 90 days to make those determinations and get back to perspective sponsors or existing sponsors.

MS. KARIN BROWN: Okay. This is Karin, and we thought we would throw in a question here. Folks would like to know how the rule changed from what we proposed to what the final rule is today. One of the key changes is the time frames. As Dana just referenced, the NPRM had suggested 95 days for, excuse me, 45 days for the registration agency to get back with a determination about a sponsor wanting to make any modifications, and it was pointed out to us, and this was an example of where we took into consideration comments from a variety of commenters, state agencies, as well as program sponsors, that the 45 day timeframe was a little too ambitious, and that a 90 day timeframe might be more appropriate. So that's, you know, an example of how we listened to the commenters and we made that change.

I think in terms of operational procedures, that was probably the largest change, in addition to kind of clarifying a bit more about provisional registration. There were some questions about that, and so we clarified that a bit more.

MR. DANA DAUGHERTY: Thanks, Karin.

MS. KARIN BROWN: Uh huh.

MR. DANA DAUGHERTY: We'll...

MS. KARIN BROWN: [Interposing] And actually we had a question regarding RAPIDS. Will RAPIDS have the capability to determine which apprentices were cancelled during the probationary period in order to provide an accurate completion rate? So we see you all are wanting to know about completion rates, and that's definitely a critical question; how we're going to deal with that.

Just to be responsive at this point we know that RAPIDS is going to have to be updated and enhanced, and Don Palmer and his team will be working closely with PROTECH to make those enhancements. In terms of, you know, when that's actually going to happen and the process for that, you know, that's part of our implementation and roll out, so we're going to have a special team who's going to be

working on making sure that RAPIDS coincide with the revised regulation. All right.

MR. DANA DAUGHERTY: Thanks, Karen.

MS. KARIN BROWN: Uh huh.

MR. DANA DAUGHERTY: Now we're going to go to 29.4. As you can see, we carried forward many of the major provisions of the original regulation, but a major new element contained in 29.4 is we replaced on the job training and work experience with on the job learning.

This isn't, for some people, a really significant change, but for us to collaborate more fully with community colleges and other education facilities within the country, training has a certain connotation and learning has a certain connotation. Learning, we felt, puts the apprenticeship system on a higher plain. Some people really don't see the value as much in training, but we felt that this change, even though it looks like a major new element, put us on par where we've always felt the National Apprenticeship System should be, and instead of continuing to beat our head up against the wall with people to value training, we know that everybody values learning, and what do apprentices do? They actually learn, so we felt it was just a very common sense direction to take.

Common questions.

MS. KARIN BROWN: Common questions. Okay. We like to say again, what were some of the key changes from the NPRM, and why was the term skilled trade deleted when describing an occupation, actually that somebody very specifically asked that question, and just as Dana said, why was there a change from OJT to on the job learning.

MR. DANA DAUGHERTY: The person on skilled trades, when we're recognizing an apprenticeable occupation, we're not recognizing just a skilled trade, we're actually recognizing an occupation as meeting the requirements. So we felt that it was the best direction to take so that when we say recognizing an apprenticeable occupation, people understand that it is an occupation. Recognizing that it can be used across numerous skilled trade areas doesn't just mean that it's in one industry or another industry, we wanted that broad interpretation to be there, and we don't

recognize just the skilled trades, we do recognize an occupation. I've already gone over part of the rationale that we use when we changed from on the job learning, I mean, from on the job training to on the job learning.

Now we go on to 29.5. And this is a summary of 29.5. 29.5 has some major changes, we felt, that were things that needed to be codified in the set of regulations, and we got a lot of input on these.

The five major components that were changed in this section were Terms of Apprenticeship, Provisions for Related Technical Instruction, Probationary Period, Transfer and Interim Credentials.

Term of Apprenticeship. We still have the traditional time based process for apprenticeship. Any apprenticeship sponsor has the choice of which one of these to use. It doesn't mean any employer has to change anything. Or any apprenticeship sponsor. JAC, JATC, no matter what, they want to stay with the traditional time based program, that's fine.

As we all know, OA implemented competency based apprenticeship in high growth a couple or three years ago because we had that opportunity but we codified in this set of regulations about competency based apprenticeship. It was revised from the NPRM, and it requires an on the job learning component.

We thought everybody would understand that if you have apprenticeship you have to have the two major elements, which is on the job learning and related instruction, but evidently other people didn't see it through our eyes, so we made that change so that there is no misunderstanding.

You must address how the on the job learning will be integrated into the program, you must describe the competencies, and must identify appropriate means of testing and evaluation of the apprentice. This is a lengthy process for a sponsor who wants to go into a competency based program.

We will be providing training on how to set up a competency based program, and all the elements that must be contained. This is just the overview, a higher level of what we intended to do.

Hybrids. We've all worked with hybrids, and it is the combination again of on the job learning with the competency spelled out, but also there's a range for the on the job learning, and several of you all have produced hybrid standards.

The choice is made by the program sponsor, subject to registration agency approval.

Going on to 29.5. Option to Use Electronic Media in Program Instruction. This was huge. The related instruction area is very confining. We all know that electronic media has been used for quite some time. If you can get a master's degree or whatever level of degree online, we ought to be able to augment the classroom instruction, augment the shop part, or enhance normal classroom instruction with electronic media. It doesn't mean everybody has to use it.

We did clarify that a journey worker is a subject matter expert and exempt from having to have certification from a state Department of Education in order to teach in apprenticeship related instruction courses. But we did keep a main thing that instructors must have training in, and an understanding of teaching techniques and adult learning styles. Just because you're an outstanding journey worker doesn't mean that you can really convey that information that you need to get across to an apprentice in a classroom.

And because of comments, we did have to clarify that an individual instructor can be hired, and that training can be done after the instructor begins their teaching effort for the apprenticeship program.

Probationary Period. In the 1977 regulations we just stated that it has to be appropriate for the length of the program or something in that terminology. Numerous commenters wanted us actually to clarify what an apprenticeship probationary period should be. So, after much debate, internal debate with people who know the apprenticeship system quite well, a probationary period cannot exceed 25 percent of the length of the program, not to exceed one year, and that whichever one of those lengths of terms is the shortest is actually the way this reads in the regulation.

This definitely puts some parameters around it. Nobody can have an apprentice be in probationary status for the length of their apprenticeship. I'm sure our people wouldn't allow that anyway, but now it's codified, it's out there, it's straightforward.

Transfer. Next section of 29.5. The NPRM wasn't quite as clear as maybe it should have been, so from the comments that we received, we went in and reworked the transfer so today transfer must be based on an agreement between the apprentice and the affected apprenticeship committees or program sponsor. That means all three of those must be in agreement before a transfer can occur.

The program sponsor or committee that is allowing the apprentice to go to another program must provide a transcript of related instruction and on the job learning. This isn't the same transcript that you would receive from a college or university. We all know everybody's got on the job learning outlines; they know what parts of related instruction have been completed. We want to protect the interest of the apprentice and ensure that they don't have to repeat certain elements that they've already received through their apprenticeship program, and we want to ensure that they get credit totally for what they have done.

Several people have thought they had needed to be in the same occupation, so we made that change. This isn't all inclusive, so we know that OA will work with our trade apprenticeship agencies and program sponsors to develop policy guidance around the transfer to make it more transparent and provide clarity, but these changes were made because of the comments that we received.

The next section of 29.5 is Interim Credentials. We had to further define the criteria for developing the utilization of an interim credential. In the NPRM, we actually had the interim credential and the completion certification provisions combined into one section. There needs to be clarification that in the final reg the ultimate is for the completion of a registered apprenticeship program and that an interim credential does not count as a completion of an apprenticeship program.

So we clarified that and we separated them. You now have a 15 and a 16, and a 16 element works directly for the interim credentials.

Things that must happen within the standards: must clearly identify the interim credential or credentials, depending on the program; demonstrate how these credentials will link to the components of the apprentice-able occupation; establish the process for assessing an individual apprentice's demonstration of competency; can only be issued to recognized incumbents of an apprentice-able occupation; and must link specifically to the knowledge, skill, and ability associated with the apprenticeable occupation.

We do believe that this clarifies tremendously what an interim credential is really supposed to be utilized for. Interim credentials are one of those elements that some industries place extremely high value on. We all know that the medical industry places high value on it, geospatial, and some of the other industries really feel that interim credentials are very important and we wanted to be able to incorporate those industries into the National Apprenticeship System. So therefore we felt that interim credentials gave us an opportunity to let certain industries experience the apprenticeship system and embrace it, and then become part of the apprenticeship community.

Not everybody will use this, but it does give us an entry into numerous industries so that apprenticeship can expand. One of the foundations of the National Apprenticeship System is the manufacturing industry. Advanced manufacturing was the first group that came to us and asked about interim credentials, and actually that's the same group who was the first one that came to us and asked about competency based apprenticeship.

So it's not just, you know, high growth industries or new and expanding industries. Some of the traditional industries may want to take advantage of this as well, and we need to be able to provide that service. As we all know, we are a service organization.

Common questions.

MS. KARIN BROWN: Common questions. Okay. Actually I noticed that Steve Meyers asked a question, so Steve, I'm going to ask if you could unmute your line and we're going to ask Steve to ask his question pertaining to...

AUTOMATED ANNOUNCEMENT: Your conference is now unmuted.

MS. KARIN BROWN: Steve.

[Cross talk]

MS. KARIN BROWN: We're kind of getting a little interaction here, so Steve, can you ask your question?

MR. STEVE MEYERS: If an apprenticeship council wants to utilize these national interim credentials because they didn't necessarily have any of their own, how is it possible for them to utilize those?

MR. DANA DAUGHERTY: All state apprenticeship agencies should use this process. The only feedback that we got from SAAs on interim credentials was that they might not be able to provide the credentials themselves. In the new regulations, if they register a program that identifies the interim credentials and how they are going to comply to ensure that it's all part of an apprenticeable occupation, and how they're going to evaluate the individual, and things of that nature, the office of apprenticeship will actually provide the interim credential, but the state will have to register the program and work with us to ensure that when the sponsor requests it, we will provide that. So yes, we're trying very hard to work with the SAAs to make this transition into the interim credentials.

MS. KARIN BROWN: [Interposing] And actually interim credentials are one of the many areas where we know we'll need to issue a lot more detailed guidance, and we're keeping a running list, and interim credentials is definitely one of those areas that we know we'll need to issue, whether it's a circular, or a bulletin, or something along those lines. And also wanted to let you know we had a couple of other questions that we might take later on as they pertain more to some of the other sections, so Michael Ferrari submitted a really good question about provisional registration, and we're going to save that to the end.

We've got a question about how will interim credentials be logged into RAPIDS, and as you mentioned earlier, we know we're going to have to update and tweak RAPIDS a bit, so that will be one of the areas as well.

And then asking about opportunities to receive copies of this PowerPoint presentation, yes, we will make a modified version available to you as part of our rollout. Exactly

when that's going to be handed out, we know we want to probably make a few more tweaks and such. So yes, we know that you are the critical folks who are going to be working closely with the stakeholder, so we want to make sure that you have the tools that you need to do that. Okay. All right. Okay. And so some of the other questions that we've been asked, you know, why is there a time limit on the probationary period, and do program sponsors have to accept transfers.

Transfers are another area where we know we're definitely going to be issuing guidance pertaining to the nitty gritty operational details of that.

MR. DANA DAUGHERTY: But as we already went over all three, do most program sponsors or committees have to agree to the transfer? No, a program sponsor would not have to accept the transferring apprentice, if they don't have the capacity or they just don't want to. I mean, that's up to them. I already discussed the probationary period, and we are going to provide training to our staff and SAAs on how to develop the competency based and hybrid apprenticeship programs standard, so yes, we will be working with program sponsors to do that. Once we've completed the training.

MS. KARIN BROWN: Okay. We noticed we had a couple of other questions regarding interim credentials, and I think for the purposes of time we're going to save them, and if we can address them at the end, we'll do that. If not, then we definitely know that these are questions that will need to be clarified in a specific webinar or in guidance, so we're going to move on to the next question for the sake of time, okay?

MR. DANA DAUGHERTY: This is the new section that was added, for Program Performance Standards, 29.6. The new section focuses on quality and performance of registered apprenticeship programs. We've all done two out of the three elements of this, and do it as a constant process of our job.

But the components are every program must have one apprentice in the program. Now, we'll go over what that actually means because there are a couple of exemptions in that. We all know that basically you get a program, you have a registered apprentice who never uses the program for its intended use, so we'd like to take care of that

process.

Evaluation of program and performance, completion rate, cancellation of an apprenticeship agreement during the probationary period.

As I said, every program must have at least one registered apprentice. We came forward with that and had to make a change from the NPRM because of the comments, and yes, some programs may have a down time when they won't have an apprentice, so we did identify exemptions which may not exceed one year: Program registration and the date of the first apprentice and the date the program graduates an apprentice and the date of registration of the next apprentice. We don't want programs to sit there idly for years, and years, and years. If they want to participate in the National Apprenticeship System we really do want them to participate fully.

Evaluate program performance. Tools and practice for evaluations. The quality assurance assessment review, we've done that for quite some time. Equal employment opportunity compliance review. We do that on every single review then the completion rate. This is the factor that we've always looked at when we begin to do the quality assurance assessments, but now this factor takes on a large role in evaluating a program's performance.

Additional tools and factors must adhere to the goals and policies of the national office this is so that our partners don't just arbitrarily place additional tools and factors on the evaluation process so that we do have that consistency. We just don't want things to be done without everybody being on board, and if somebody comes up with another tool or factor that we need to consider, be most assured we want to do that.

Completion rate reference is back to the definitions, and in 29.2, and completion rates for the review of a program in 29.6 will be based on national average completion rates. This national average will be by occupation and industry. We know that this kind of information, we will be working with partners to determine appropriate average that everybody can agree on, and we will share that with staff so that we are working consistently across the country.

Technical assistance will be provided to programs with low

completion rates. We already do provide technical assistance, we just needed to codify that, and technical assistance is one of the ways that we can hopefully bring programs who maybe are not at the level of quality that we were looking for. We can assist them. We want apprenticeship programs that are not in the business of not being inclusive; we just want all of our programs to be of the highest quality possible.

The next area is cancellation of an apprenticeship agreement during the probationary period. Uh, cancellation during your probationary period will not have an adverse impact on a sponsor's completion rate. Sometimes someone gets into an apprenticeship program, have absolutely no idea why they're there, literally don't want to be in that kind of work, whatever the rationale is, why they decide that's not the way that they want their career to go, then able to terminate from that program for an apprentice dropping out from that program. But the program sponsor should not have an adversely impacted completion rate. That's also another reason that we need to put parameters around a probationary period so that there will be no questions on what happened as far as completion rates go.

And we're into common questions again.

MS. KARIN BROWN: Okay. I think one of the key questions that we heard a lot of commenters ask about was the notion of completion rates compared to like industries and like occupations, so why did we make the change to use the national average.

MR. DANA DAUGHERTY: Basically from the comments that we got from the NPRM was the fact that we were going to have warring factions between two programs in the same industry and the same occupation in maybe one small or one small regional area, and during the comparison program, the program wasn't nearly as fair and as objective as realized in the national average.

MS. KARIN BROWN: Okay. One of the other key changes from the NPRM that we got a lot of questions about was the requirement to have at least one registered apprentice. Folks were asking for some sort of timeframe associated with that, so back in 29.6A, that requirement that you have to have an apprentice, the final rule kind of specifies and clarifies that there are some exceptions, and again an

example of where we were very responsive to commenters, and in fact the recommendation was what the language ended up being in the final rule was one that came specifically from a commenter. All right. And then one other kind of question that we received a lot questions about; what other factors, beyond completion rates, are taken into consideration regarding program performance? I think folks were real concerned that completion rates were going to be the be all and end all, and so we want to emphasize that that's not the case. That the quality assurance assessment process, the information that's identified during those reviews, and the EEO reviews which Dana mentioned we've been doing those kinds of reviews for many years, so we're, to use legal terms, we're codifying existing practice.

So again, to emphasize that the purpose of this section is that we want to look at the performance of an apprenticeship program from a total quality perspective. So again, completion rates aren't the only aspect. Okay.

MR. DANA DAUGHERTY: Now we're getting on to Apprenticeship Agreement 29.7. It does carry forward quite a bit of the existing requirements from the Apprenticeship Agreement. As you all know, or at least I think most of you know, we have to actually have the apprenticeship agreement approved by the Office of Management and Budget and we do this basically every three years, and we are in the process of having it approved right now, and it just has to be done we needed a federal register, like, today. So that's to get everybody the opportunity to see what the new Apprenticeship Agreement is going to be, no huge out of the way changes, but we do want to continue to allow, on a voluntary basis, the inclusion of the apprentice's social security number.

We revised the NPRM statement showing the need to include the on the job training component for programs using a competency based approaching, and actually I think it even incorporates the hybrid, does it not?

MS. KARIN BROWN: Exactly. Yeah, and actually just real quick a quick clarification; when you referenced that the Apprenticeship Agreement, the OMB approval was just went in today, that was for our existing Apprenticeship Agreement form.

MR. DANA DAUGHERTY: Right.

MS. KARIN BROWN: So where it says revised, add statement to show on the job learning and competency based, that means, and pardon me for sounding like a real...

MR. DANA DAUGHERTY: [Interposing] Bureaucrat?

MS. KARIN BROWN: Bureaucrat, what this means in terms of we have the regulatory authority to collect that information the next time we go and update the apprenticeship agreement form. So we just got the authority today, or excuse me, this week to collect that information, but the form itself, next time we go and update it, that's when we'll be adding that information.

MR. DANA DAUGHERTY: Ode for joy. Okay. Let's move on and see the Deregistration of an Apprenticeship Program. This is 29.8, and it carries forward most of the language from the original rule. There needed to be some additional language that we did add to provide examples of factors that could contribute to a program's deregistration. This does clarify a lot of what we have always used, but now it's actually in the regulatory form.

Failure to provide on the job learning. Failure to provide related instruction. Failure to pay apprentice's appropriate wages. Patterns of poor quality assessment results and patterns of low completion rate over several years. These are examples. These are factors. This doesn't mean that it's all inclusive, but this does provide guidance in the regulations that can have an adverse impact and lead to deregistration of a registered program.

The next sections, sections 29.9 through 29.12, and including 29.14, there were some administrative changes, but basically they're all the same as the NPRM. 29.9, Reinstatement of Program Registration. Herein for Deregistration is 29.10, Limitations, 29.11, Complaints, 29.12, and Derecognition, 29.15. There were no significant changes in those, so we really aren't going to go into those in any great detail.

MS. KARIN BROWN: Okay. Well, I'm going to take a quick break and address some of the questions that have come in, and again appreciate the folks for submitting these questions.

Will quality assurance assessment documents be developed to reflect the new language? Absolutely yes. We are

definitely going to be revising and updating the guidance and the procedures for quality assurance assessment to reflect what's in the new language in the revised regulation. Okay.

Another question regarding Provisional Registration. Provision Registration in Section 29.3. Is the intent mandating a Quality Assurance Assessment, since we must validate the quality of the new provisional program after one year? If this is the case, and a person registers 20 programs, then the following year must they conduct at least 20 quality assurance assessments?

Again this is one of the areas where we're going to be issuing some clarifying guidance to say how Provisional Registration and Quality Assurance, how they're related or not related, so we will be giving some specific examples in some of the guidance that we're going to be developing and issuing on that. Okay.

And then some questions regarding interim credentials. Can they be issued at the OA state level? And will the state director or regional director be able to approve standards that have interim credentials and issue the certificates?

MR. DANA DAUGHERTY: That's where we actually hope to get it to. We know we need to provide guidance on that, and that will be coming out hopefully in '09 sometime.

MS. KARIN BROWN: Uh huh.

MR. DANA DAUGHERTY: We have several areas of the regulation that we are going to be providing guidance on, and right now everything is just kind of in a whirlwind, so we definitely do intend to do that, and we may be asking for some of your all's expertise to get on a team to help us develop this guidance. We really do think that that's important.

MS. KARIN BROWN: Uh huh. Okay. Um, we also had a question about cancellations automatically being calculated in rapids. Again you have Don and his crackerjack RAPIDS team is going to be working on these kinds of implementation issues, because we know that reporting is and actually operationalizing this is really going to be critical.

MR. DANA DAUGHERTY: And there's a couple of points that I don't know whether you all are aware of this, but we have a

family member who has come back to help us a little bit, and Sue Allison [phonetic], and she's also been providing some questions. So that she thinks we need to talk about. Even though these regs were published yesterday, actually on Federal Register, they don't take effect and then are actually implemented for 60 days from yesterday, so that will happen actually on December the 29th, so we will have all had Christmas and possibly getting our Christmas debt in by the time they are implemented.

MS. KARIN BROWN: Dana?

MR. DANA DAUGHERTY: Yeah, it gives everybody time to read the new regulation. Maybe we can start thinking about providing the guidance but on the different sections that we need to.

So with that we want to move to 29.13. Recognition of a State Apprenticeship Agency. This is a summary. Linking it with the State Economic Development Strategies and the Public Funded Workforce System. Reciprocal approval provides modification to proposed modification in legislation and regulatory policies and/or central procedures.

So the first area is recognition of a State Apprenticeship Agency. We found, through doing the reviews at the national office level of all the state apprenticeship agencies that we needed to ensure that those that are recognized to carry on for federal purposes, as far as the registered apprenticeship system goes, we needed to have a government agency through a government agency recognition process, so that conformity and consistency is across the board and that it is government to government.

As we know, some of the sites that are out there are quasi-governmental and not truly a governmental agency. So for accountability reasons we really wanted to go government agency to government agency.

Here is we have the requirement to establish a state apprenticeship council. We do value state apprenticeship councils. There's no doubt, we make that mandatory, and we are not restrictive about whether they're advisory or regulatory. Removes the requirement for SAAs to be located in the State Department of Labor. We don't say where that location needs to be, but during our reviews of state

agencies, State Departments, of Labor, we found that several states that were not going in the direction that they needed, they more or less in workforce development, or they want to be in economic development. Different areas and the state really wanted that flexibility.

In the NPRM we actually used language, as far as sufficient resources, as for the registration agency, the language that we put in the NPRM was that they needed to supply sufficient staff and budget, and due to the recommendations and comments that we receive, we changed that and we inserted sufficient resources. That being is a state's rights issue, and they need to decide what their economic situation would allow for sufficient resources.

Recognition of an SAA. 29.13 again. Linkages with the State Economic Development Strategies and Publicly Funded Workforce System. Aligns with efforts to a standard apprenticeship in high growth, high demand occupations. We deleted, as a separate section, 29.13A(6), merged it with 29.13A(4) and required submission to include other requirements for recognition.

Originally in the NPRM that linkage with the workforce system was very structured and a little too demanding, and there's no way that we can guarantee that that was going to happen, so we wanted to give state apprenticeship agencies the ability to attempt to connect with the workforce system, but we all know that that's not the direction the government wants things to take, that's not going to happen, but at least they are willing to do that.

Reciprocal Approval. Removed the exemption for the billing construction industry. For federal purposes we did add to that section that a program seeking reciprocity must meet the wage and hour provisions and apprenticeship ratio standards of the host state.

Now, there were a couple of reasons that this is significant. I'm not sure how many of you know, but the Davis Bacon Regulations on apprenticeships and trainees actually reads, "When a contractor is performing construction on a project in a locality other than that with which the program is registered, the ratio and wage rates specified in the contract with or subcontract as registered apprenticeship shall be observed."

And then it goes into how every apprentice must be paid not less than the rate specified in the registered program for the apprentice level and progress.

Basically, under the Davis Bacon Regulations, you can take a program from anywhere in the United States and utilize it anywhere else in the United States without the state even knowing that there was an apprenticeship program working in their state, utilizing the rights and privileges that are provided through the apprenticeship system.

There was no reciprocity. We have codified the fact now that there must be reciprocal approval, that an apprenticeship sponsor that is going to use apprenticeship in another state for federal purposes must request if they want to utilize their apprenticeship program in that other state. Reciprocity. But they also must meet the wages and hour provisions, and the apprentice ratios I believe, uh, post-state. This was actually pretty major, because our attorneys from BTLs had to actually go in and negotiate with ESA attorneys about the regulations. Our reciprocal approval now takes precedence and protects the welfare and the rights of the apprentices in a host state, makes a more level playing field. There was a case that was lost, as a matter of fact OMB asked us the question and I'm not sure they knew there was case law, but there was a case where interstate commerce was utilized and the Court found that the state that they were going to had been totally restrictive, requiring them to register a new program. So from our legal advice is that we have taken that off the table, there shouldn't be lawsuits involving the majority of a registered system, and that we now have reciprocity established, and we do take precedence over the data spec and regulation.

Okay. Let's go on to proposed modification and legislation regulation policies and/or operating procedures. In the NPRM we made the statement that SAAs actually had to submit those before they went into operation in an SAA and they had to get our approval before they could be implemented.

We changed that to concurrence rather than approval, and yesterday in our conversation with the SAAs, one of them asked if this wasn't just a matter of semantics and we wanted to make it sound a little better. Well, no, it obviously isn't, and again I go back to if you look at the

preamble, and this is an extensive preamble, and an excellent preamble, it is the persuasive authority, and I think reiterates that sufficiently. We make it very clear in the preamble that we want the opportunity to see proposed modifications before a state implements something so that we can avert having conflict, so that we can discuss it, maybe negotiate, hopefully we can allow the state to get where they want to be.

But in the preamble there is also language where they could have what's called a failsafe statement in the legislation or regulation that they want to implement, where it says if the national office the Office of Apprenticeship, just doesn't meet our regulatory requirements, and imposes something that we feel would impinge on the National Apprenticeship System, that it doesn't get implemented, there's no harm, no foul, it doesn't have to go back to legislature to be removed or anything like that.

So go back and read the preamble, the preamble is incredibly important, they know it's not just semantics.

MS. KARIN BROWN: Okay. All right. So as we've been asking all along, what are some of the key changes from the NPRM, and one of the key areas where I think where we heard overwhelmingly from state apprenticeship agencies, but also from program sponsors, was reciprocal approval.

MR. DANA DAUGHERTY: Right.

MS. KARIN BROWN: So Dana described, you know, how we took to heart and really gave some serious consideration, so that is definitely a key area where the final rule has changed from the NPRM where we added the clarifying language about needing to meet the wage rates and ratios and standards for the reciprocal state.

MS. KARIN BROWN: Yeah.

MS. KARIN BROWN: And the other areas of changes that Dana just kind of went through that we changed, rather than saying we're going to approve the states' changes in legislation and regulations, we're going to concur. But this is very much an area where it will be important for our regional and state staff to help us keep track of and be aware of what's going on in the SAAs, as they develop as proposals

and changes come about, so that we can coordinate and work closely with them.

And again, as Dana mentioned, the preamble really has some very explicit language explaining why we are doing this. As we were clearing it through the Office of Management and Budget, they really pushed us on why do you want to do this. So we again can't emphasize enough that it's to work closely with the states to help them not have any kind of punitive or I gotcha kind of situation.

One of the other key areas is the transition period for SAAs to comply with the final rule. How are we going to do that? The NPRM provided for one year from the effective date. We realize that there's going to be a lot involved with the SAAs making changes that they need to, to be able to comply and be in conformance with this revised regulation, so our final rule provides for up to two years from the effective date.

So we know we'll be working closely with the SAAs, particularly over the next year or so. We don't want to wait until the final hour at the end of that two year period, so we're hoping that we can work closely with them throughout the next couple of months, and throughout 2009. And again this is an area where we know we're going to need to put out some additional guidance as to what their package of information that they're going to need to provide to actually reapply for recognition. That is definitely a key aspect of the final rule, and it carries forward with what we said in the NPRM, and that all currently recognized SAAs will need to reapply for recognition. Okay.

And then we have some changes about linkages with workforce and economic development entities. So I'm going to turn that one over to John and explain sort of how and why. Dana kind of elaborated a little bit more, but the benefit of keeping that language in the final rule.

MR. JOHN LADD: Sure. Hi again, everybody. No, we really wanted to maintain this as part of our ongoing efforts to support integration between registered and the workforce system, as well as part of the broader efforts within the Department to focus on regional economic development strategies and thinking about how registered apprenticeship is that critical development strategy that more states and

regions should be using, and should be part of their efforts to develop comprehensive talent development plans.

So we have taken it out as a specific part of the regional economy rule text, so it's an effort to ensure that there's some coordination, there's some linkage that happens there, and I think that it's important, as we're all looking forward to partnerships in those linkages with the workforce and education system, as well as the economic system.

MS. KARIN BROWN: Thanks, John.

MR. JOHN LADD: Sure.

MS. KARIN BROWN: All right. So we're pretty much almost done with the summary of the regulations, so let's go on to John just doing a quick summary of the key changes, and that might prompt on a few other questions, so we'll ask you again to submit questions that come into your mind now. John?

MR. JOHN LADD: Sure. Thanks, Karin. Well, you've heard a lot here and I'm sure it's a lot to absorb. You all are experts in registered apprenticeship in the current regulatory framework, and we can see the great expertise that we have here with Karin and Dana, and the whole team has been working hard on this for the last few years, so we really rely on them for their expertise. We're going to have to make sure that we're all experts in this new, final rule.

Just to sum up a little bit here; these elements that I'm talking about here, really some of the major components, the new elements, the new provisions that are above and beyond what was carried over from the original rule, and they of course include provisional registration with the two additional approaches to the terms of apprenticeship beyond the traditional time based, you know hybrid and competency, use of electronic media, use of interim credentials, clear performance standard, including the different completion rates. The changes to reciprocal approval, as well as the process in the procedures, and the expectations providing recognition of the state apprenticeship agencies, and the fact that we will no longer be recognizing SACs as the registration agency.

So those are the key provisions, the ones that we really wanted to highlight here today. There's obviously a lot more detail in that final rule. You know, when you have time curl up with it, take some time to pour yourself a nice cup of cocoa or something, and curl up by the fire, read this document from beginning to end, it's a real page turner, it'll keep you up at night, and in fact we were really very proud of the quality of the rule and how well it's written, the clarity of the rule, and I think it provides a really solid foundation for the future.

Again I just want to remind folks that again we do see the regulations, not just as a necessary update to a rule that was 30 years old, but really one that provides a lot of new opportunities for registered apprenticeship, ones that were already there and ones that I know many of you have already been taking advantage of, but again, these new options and new flexibilities provide a lot of opportunities to grow, and expand, and advance the National Apprenticeship System.

It's an opportunity to invite new industries and to expand our existing industries and use the apprenticeship model as a talent development strategy. We believe that these regulations will provide for greater consistency across the entire National Apprenticeship System, reflect the realities of businesses that are operating regionally and competing globally, and ultimately addresses the needs of today's apprentices by providing flexible pathways to advance in their careers.

So there's tremendous opportunity here, and we are very excited about these regulations, and we're really looking forward. We know we still have a lot of work to do regarding how we implement these, how we operationalize these. There's a lot of work that needs to be done and work that's going to engage all of us. We will be looking to you to get involved in workgroups to review our draft policy documents, to give us feedback, to really help contribute to the further rolling out of the regulations over the next year

What I want to do now is then move into some of the next steps, where we have some more questions that we will take.

MS. KARIN BROWN: Sure. When are state going to have to use new boilerplate standards, immediately?

MR. DANA DAUGHERTY: [Interposing] It's just beginning.

MS. KARIN BROWN: Yeah. So the effective date for the rule is 60 days from publication, so December 29th is when the rule goes into effect, so we have a couple of months to get ready and transition to that.

The next question; when will training on competency based and hybrid models be provided? That's the \$64,000 question.

MR. JOHN LADD: Yes, it is, and we are working on them, and we have been thinking about that, and we understand that we do have some expertise in the system. We've got folks, as well as Paul Bladerman [phonetic] who's worked on the his competency model, so we do have some expertise out there, we do plan on doing a number of things. First at a minimum it'll be at least some webinars that will focus on developing competency based apprenticeship programs. We also intend to do some training around this some time during 2009. We'll be tasking Fran's shop to pull together a group on that to pull together those who have expertise in developing a competency based model, and developing some curriculum around that.

And then finally, and we'll get this a little bit later; we are going to be releasing a SGA in the next couple of weeks that will provide some resources to our national stakeholders to develop, well, to develop new or to revise this thing, a National Guideline Standards that incorporates many of these elements that are contained in the new regulations, so there will also be a portion of that SGA that will include some technical assistance where they can partner with organizations that have capacity and expertise in this area, and we hope to be able to leverage any tools and resources, and any of the products that come out of that SGA process, that we can use for our own staff and for our own use. So look for a series of training opportunities throughout 2009, and it's something again we're going to be looking to put a group of folks together around so that everybody feels comfortable in developing those kinds of standards.

MS. KARIN BROWN: All right. One last question in a side by side comparison from the original rule to the NPRM, and folks want to know if there will be an updated document comparing to the final rule. And we are looking into

seeing how to best display the information that really shows the nitty, gritty details of comparing the old rule, I should say, the '77 rule, to the new rule. So we're looking into that.

MR. JOHN LADD: And that's all that we have to have cleared through our legal office, but it is something that we'll look at and I think that could be a great tool for people to understand very quickly what's changed and what's changed on the NPRM, so we will do that.

I know that we're coming up on the two hour mark and we have a few more things we want to cover with you, as well, as if you bear with us, there must be a little bit of feedback on how this session has gone today, and any feedback you can give us on any adjustment to things you might want to make to the afternoon session.

So let me sort of walk through quickly our next steps and what we're planning to do to continue to keep the apprenticeship community apprised and informed of all the latest developments, and any new information related to these regulations. I'll walk through that really quickly.

But first we've eluded to this a number of times. There are at least these six, and there's probably more to be added, a list of areas that we know we need to develop further policy guidance on. We very deliberately did not try to get too descriptive in this current rule on these areas, as we felt that it would be overly restrictive in the rule and would cause more problems later on and, ultimately probably would have forced us to revise the regulation again.

But these are areas where we want to provide some broad guidelines, but more importantly then to go out to the entire apprenticeship community again, engage stakeholders and put more definition, clearer policy, and better guidance around at least these six areas, including performance standards, particularly the completion rate issue, the appropriate use of electronic media related to instruction, the interim credential deployment is going to take a lot of thought and thinking about how to roll that out.

Provisional registration, obviously we're still, well, we're already getting a number of questions on that area.

Competency based apprenticeship, beyond the training there's a number of issues related to how the competency based apprenticeship will be rolled out and approved.

And then finally the whole process and materials necessary for SAA recognition; initial recognition and continued recognition.

This is our starter list. It's by no means adopted, but we can certainly intend to this. But it is an area where we intend to keep the dialog going and engage the entire community in the development of this policy guidance, and we'll be looking to you to be involved in that as well.

Moving on, we are planning a fairly comprehensive strategy here to try to get information out to everybody that is interested in keeping advised of new developments with the regulations. Today's webinar is a good first example. We felt that the entire apprenticeship community and we will be planning a series of these webinars, where we will go to the specific topic areas and go into them more in depth.

We can have an entire webinar on competency based programs, we can have one on interim credentials, we're developing a list of those, and we're looking forward to at least one a month or one every couple of weeks, so that is something that we were planning on doing.

All of these webinars will be archived and available both through direct links on the OA website as well as Workforce Three One.

You should also know, and I hope many of you have already visited; we have developed a dedicated regulations webpage that's accessible off of the OA homepage. If you go there, that's going to be the clearinghouse for all new information, particularly as we develop new questions and answers. Those Qs and As, once they're cleared by the lawyers here at ETA will be posted on that website, and that will be where we post the new webinar information or any new updates, and I hope you go in and take a look at that.

It's also kind of a preview of the new look and brand new for the OA website. We're using this launch of the regulations to kind of soft launch that new logo and design for the Office of Apprenticeship. It's part of our overall

education and outreach campaign that we will be conducting in conjunction with the rollout of these regulations, so we'd appreciate you look at that and we hope you enjoy the new look.

Also available off the website, I think there are two ways you'll be able to opt into an electronic newsletter. I think many of you are already included in that database, and should be receiving it. I think we've already sent out two newsletters with that function off the website, but if you're not getting the newsletter, please go to the OA website or go to the link on the screen here and sign up for that newsletter. It'll alert you when there's new information on the webpage, when there's a webinar, or when there's any new information to share with you.

Dana mentioned earlier, We have set up a dedicated email address. It's there on the screen; regs.apprenticeship@dol.gov. We strongly advise you to funnel all questions that you receive on the regulations to this email address. This will be the central point where we collect those questions, where we can review them, or sort them, we can bundle those common questions together, and we can prepare a set of answers to those questions that can be cleared by the legal team here, and that we can then distribute to the entire apprenticeship community. It's very important that at this time you do not interpret the final rule. Questions of fact to be answered, references to things that are in the rule that are in this PowerPoint, so we can share that information, but we ask that you not interpret the rule at this time. We have to be very clear and very consistent in the guidance that we put out to the entire system.

I mention this RFP already. That will be coming out shortly. It's going to be \$6-1/2 million and it will be available primarily to national stakeholders from all sides, from the employer's side, from the union side, and will be targeted to those groups who revise or develop new standards to incorporate many of these new elements that are contained in the regulations.

And the finally I know many of you are already engaged in this activity, but I wanted to put in a plug for our upcoming action clinics. These are really an opportunity for us to present the new framework, this modern regulatory

framework, and apprenticeship for the 21st century framework to a broad audience, including the workforce system, as well as other partners in the education system, the economic development system, as well as local organizations.

So our first one is kicking off in Chicago and we've had great support from the team in Chicago. We're then moving down to Dallas in January and we'll be in Oakland and Atlanta later in the year, but that will be an opportunity for us all to have some face time. We're planning on combining a staff meeting prior to the kickoff of the action clinics, where we can all get together, where we can spend some time going through these regulations, where you can ask questions directly of the experts here, and that way there'll be a lot more time to get into the meat of this.

We'll also be spending some time after the sessions to have some quorums and dialogues with the state apprenticeship agencies on specific topics, so that we are going to be looking to piggyback on the action clinics as a way to do some more training and to get some more information out to you, as well as an opportunity for us to present this new framework to a much broader audience.

So as you can see, this is an ambitious and comprehensive effort here to try to get information out to everybody, to get everyone trained, to get everyone feeling comfortable with these regulations, and to make sure we've got the capacity and the ability to deliver these regulations. It's really going to add a lot of new functions, a lot of new requirements for us, particularly on the OA side. We mentioned that the rules go into effect within 60 days, and it's a very tight time frame for us to put a lot of these pieces in place, and as busy and as hard as everybody's been working to get these regulations published, it doesn't end with the publication of these regs, it's going to continue and it's going to involve all of us in making the implementation of these regs a success.

So with that I'm going to thank you all. We really do appreciate you giving up two hours of your day to be with us here today. We thought it was critically important to get this information to you, to get it to you quickly and to have an opportunity to get them to you before we went

out to the general apprenticeship community. So we do have this information as fully as possible.

So with that I think I'm going to wrap up here, but we've only got a few minutes left here, and I know folks are trying to absorb a lot of information, but we are going to be doing this again in about two hours with the broad apprenticeship community. I think we currently have over 600 people signed up for that webinar. We're probably expecting a late flood of people to fill that capacity.

We do ask that if you have OA staff that have not signed up for that webinar, please do so now. I know many of you wanted to sign up to be able to hear some questions that get raised from your state and from your area, so we do ask that you sign up for that webinar.

But if you could give us a little feedback on how this went today, how the flow went, could you hear us well, did the platform, we're using a different platform to do this webinar, as we needed more seats available than we would have with Workforce Three One, were there any issues with that. I know some of you had to download a little applet to get it to work, were there issues with that, how did it flow, any feedback at all would be really appreciated so that we can tighten this up for this afternoon.

I think we'll need to wrap up here.

[END]